

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

**ERIC JACKSON, ALARIC STONE, and
MICHAEL MARCENELLE**, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

KRISTI NOEM, in her official
capacity as Secretary of Homeland Security, et al.,

Defendants.

Case No. 4:22-cv-00825-P

JOINT MOTION TO EXTEND DEADLINE

Plaintiffs and Defendants hereby move to extend the deadline to file the joint status report ordered by this Court at Dkts. 124 & 126 until August 9, 2025, for the following reasons.

1. The parties engaged in productive mediation on June 25, 2025, and intend to engage in further settlement discussions as noted in Hon. Judge Ray's Minute Order today. *See* Dkt. 132.

2. Consistent with the parties' discussion on June 25, 2025, Plaintiffs will submit a formal response to the Defendants' counteroffer by July 1, 2025. Defendants will submit a formal response to Plaintiffs by August 1, 2025.

3. The parties will engage in a second mediation on August 8, 2025, but agree they will first attempt to resolve any differences without the need for mediation and will cancel or stay the mediation should it become unnecessary. If the mediation is not canceled or stayed, Plaintiffs' and Defendants' counsel will meet in person in Washington D.C., and Judge Ray will participate remotely. Plaintiffs shall participate in person or remotely, except for Plaintiff Alaric Stone, who will likely be unavailable due to mandatory training. A representative from the Coast Guard shall participate in person, and a representative from the Department of Homeland Security shall be available by phone.

4. The interests of justice will be served by an extension, and no party will be prejudiced thereby.

WHEREFORE, the parties move the Court for an order extending the deadline to file the joint status report ordered at Dkts. 124 & 126 until August 9, 2025.

Dated: June 26, 2025

Respectfully submitted,

/s/ Michael McHale

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